

MEMORANDUM

To: Director, Office of Acquisition and Property Management, Washington, DC
From: Linda Waring-Wilson, Manager
Acquisition and Assistance Management Services, D-7800
Subject: Buying Year 2000 Compliant Products - Are You Y2K OK?

Reference is made to Memorandum, Senior Procurement Executive, October 5, 1998, subject as above.

As requested by the referenced memorandum, I am certifying that all of our purchasing and contracting personnel are fully aware of and follow the **Y2K procurement policies of DIAPR** 1997-6. As described in the following paragraph, we also have appropriate acceptance testing procedures in place that are regularly used to confirm Y2K compliance of information technology products and other products that rely on imbedded time and date processors.

The information technology described in DIAPR 1997-6 typically meets the commerciality test inherent in the definition of commercial item at FAR 2.101. Therefore, Reclamation has, except for mission critical systems, relied on contractors' existing quality assurance systems as a substitute for Government inspection pursuant to FAR 46.202-1. For mission critical systems, Reclamation has exercised its reserved inspection right under the clause at FAR 52.212-4. Reclamation has in place a set of comprehensive inspection and testing procedures which it has used to insure Y2K compliance for these mission critical requirements.

Please advise if you have any questions or wish to discuss.

cc: R Feuerstein, D-71 10

[illegible]

From: Julie Landin
To: INTERIOR-CCM.-IOS#MAIN.Titcomb Dean
Date: 2/17/98 2:15pm
Subject: PURCHASING OF YEAR 2000 CX14PLIANT PRODUCTS

D-7800
ACM-1.10

February 17, 1998

MEMORANDUM

of the Acquisition Office Property Management
Attention: Dean Titcomb
FROM: Linda Waring-Wilson
Manager, Acquisition and Assistance
Management Services
SUBJECT: PURCHASING OF YEAR 2000 COMPLIANT PRODUCTS -
RESPONSE TO DEPARTMENTAL MEMORANDUM DATED
JANUARY 15, 1998

Background

In response to the subject memorandum, our office transmitted a request dated January 22, 1998, to each of our five regions; the Phoenix Area Office; Reclamation Service Centers Acquisition Operations Group, Denver CO; and the Administrative Service Center, Lakewood CO, requesting feedback on compliance with Year 2000 policies. Presented below are the issues we addressed (in italics), and our Reclamation-wide consolidated response to these issues. Based upon these findings, we have also included a Section below on recommendations for future action.

Findings

1) Review 10% of purchase actions over \$2500, including delivery orders, purchase orders; and contracts since April 1, 1997, for information technology items/services, etc. which rely on date/time processing (while this would primarily apply to acquisition of information technology, examples of other items included are telecommunication network devices (i.e., routers, bridges, repeaters, servers, concentrators, etc.), PBX equipment, security systems, scientific recording equipment, elevator controllers, and environmental control systems.).

Although we requested a sampling of 10% of actions, we found that offices sampled anywhere from 10% to 50% of applicable actions. We feel that the total sampling performed represents an accurate picture of Reclamation-wide compliance with Year 2000 policies.

2) Determine and comment on whether the applicable specification for Year 2000 compliance (as *indicated within* DIAPR 1997-6) was included in the purchase order, delivery order, or contract.

Only one Region indicated that it has not been including the required

applicable specification for Year 2000 compliance in its contracts, purchase orders, and delivery orders. However, this Region did test its computers during 1997 to ensure Year 2000 compliance. The results from all other offices ranged from sometimes including the specification, to always including the applicable specification.

There appears to be widespread confusion on when to include the applicable specification for Year 2000 compliance in the purchase/delivery order/contract. For delivery orders under other agency contracts, the assumption for some was that the contract for which the delivery order was being placed had already been modified to include Year 2000 compliance.

3) *For purchase card transactions, specify whether any instructions, notices, or training were provided to purchase card holders to ensure that Year 2000 compliant products/services were purchased.*

Each Reclamation Region and other offices have an in-house Year 2000 coordinator (generally, someone within the Information Resources office) who provides ongoing information to all employees about Year 2000 compliance issues. In addition, our Acquisition and Assistance Management Services office provides ongoing updated information to Reclamation's acquisition offices on Year 2000 policy issues which affect purchasing of goods/services. The level and nature of information received from Region to Region on the subject of Year 2000 truly varies.

On May 20, 1997, our headquarters office transmitted IARC *Memorandum 1997-9* dated May 15, 1997, to the Chiefs of our Contracting offices, with instructions to disseminate to all purchase card holders. In this transmittal, it was emphasized that all purchase card users must comply with the Government wide regulation to buy only Year 2000 compliant technology. In addition, specific coverage is included within the Reclamation Manual -Directives and Standards - IRM 02-01 (dated 12/3/96) which states that 0 contracting specialists and credit card holders are responsible for acquiring only information technology resources that are certified to be year 2000 compliant.0

4) *For all purchases (including purchase card transactions), review and comment on the acceptance testing procedures used to verify the delivery of Year 2000 compliant technology.*

There appear to be no formal procedures in place on a Reclamation-wide basis for acceptance testing of products for year 2000 compliance. However, many offices have their own internal procedures in place to test the products. Also, many vendors are now including a certification within their quotations which states that offered products are Year 2000 compliant.

Bureau of Reclamations Year 2000 coordinator has developed a YEAR 2000 System Compliant Certification form, which explains Reclamation compliance rules and requires certification of Year 2000 compliance by the system custodian and manager. This form will be distributed on a Reclamation-wide basis in the near future.

Recommendations

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1. Since many Reclamation acquisition offices are not inserting the required Year 2000 compliance specification in their purchase orders/delivery orders/contracts on a consistent basis, a reminder notice will be issued to clarify to these offices what they need to do. These offices have already expressed to our office that in spite of their past oversight in not including the coverage, they will include the specification in all future contracts/purchase orders/delivery orders.

2. since date/time processing may include more than just information resources products (such as routers, bridges, repeaters, scientific recording equipment, environmental control systems, etc.), we will work with Information Resources in developing additional guidance to better define the scope of products for Year 2000 coverage.

3. The Bureau of Reclamation Government wide Purchase Card Handbook will be revised in March, 1998, to include required Year 2000 compliance coverage. It is recommended that Department of the Interiors Handbook for Utilization of the Government wide Commercial Credit Card also be updated to include this coverage. In addition, we will include Year 2000 compliance information in our purchase card training program.

4. It is recommended that bureaus create a template within IDEAS to include the YEAR 2000 complaint specification. This way, purchasing agents/contract specialists can easily choose this specification from the menu for inclusion into the purchase/delivery order or solicitation.

CC: KGORDON